

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

NOV 05 2019

J.H.

FOR THE DISTRICT OF NEW MEXICO

MICHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KAMAL BHULA, a.k.a. "Rocky,"
JOHNATHAN CRAFT, a.k.a. "Jonathan
Craft," a.k.a. "YN," a.k.a. "Wayan,"
EDDIE HILL,
WILLIE HORTON,
PRAGNESHKUMAR PATEL, a.k.a.
"Pete,"
and
OMRAM, LLC,

Defendants.

) CRIMINAL NO. 19-1631 JB

) Count 1: 18 U.S.C. § 1594(c):
Conspiracy;

) Counts 2-4: 18 U.S.C. §§ 1591(a)(1) and
(b)(1): Sex Trafficking by Means of Force,
Threats, Fraud, and Coercion; 18 U.S.C. §
2: Aiding and Abetting;

) Count 5: 18 U.S.C. §§ 1591(a)(2) and
(b)(1): Benefitting Financially from a Sex
Trafficking Venture; 18 U.S.C. § 2:
Aiding and Abetting;

) Count 6: 18 U.S.C. § 1952(a)(3)(A):
Interstate and Foreign Travel and
Transportation in Aid of Racketeering
Enterprises; 18 U.S.C. § 2: Aiding and
Abetting;

) Count 7: 21 U.S.C. § 846: Conspiracy;

) Count 8: 21 U.S.C. § 856(a):
Maintaining a Drug-Involved Premises; 18
U.S.C. § 2: Aiding and Abetting;

) Count 9: 21 U.S.C. § 860(a):
Maintaining a Drug-Involved Premises
Within 1,000 Feet of a School; 18 U.S.C.
§ 2: Aiding and Abetting;

) Count 10: 18 U.S.C. § 1956(h):
Conspiracy.

S U P E R S E D I N G I N D I C T M E N T

The Grand Jury charges:

Count 1

Beginning on a date unknown, but not later than on or about September 2017, and continuing to on or about June 18, 2019, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, and PRAGNESHKUMAR “PETE” PATEL**, in and affecting interstate and foreign commerce, did knowingly combine, conspire, confederate, agree, and act interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to recruit, entice, harbor, transport, provide, obtain, and maintain women by any means, and to benefit, financially and by receiving anything of value, from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining women by any means, knowing and in reckless disregard for the fact that means of force, threats of force, fraud, and coercion would be used to cause Jane Does 1, 2, and 3 to engage in a commercial sex acts, in violation of 18 U.S.C. §§ 1591(a)(1) and (2), (b)(1), and 2.

In violation of 18 U.S.C. § 1594(c).

Count 2

Beginning on a date unknown, but not later than on or about September 2017, and continuing to on or about September 2018, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, PRAGNESHKUMAR “PETE” PATEL, and OMRAM, LLC**, in and

affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, Jane Doe 1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause Jane Doe 1 to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1), (b)(1), and 2.

Count 3

Beginning on a date unknown, but not later than on or about September 2017, and continuing to on or about June 18, 2019, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, PRAGNESHKUMAR “PETE” PATEL, and OMRAM, LLC**, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, Jane Doe 2, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause Jane Doe 2 to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1), (b)(1), and 2.

Count 4

Beginning on a date unknown, but not later than on or about December 2018, and continuing to on or about January 2019, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, WILLIE HORTON, and OMRAM, LLC**, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, Jane Doe 3, knowing and in reckless disregard of the fact that means of force, threats of

force, fraud, and coercion would be used to cause Jane Doe 3 to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1), (b)(1), and 2.

Count 5

Beginning on a date unknown, but not later than on or about September 2017, and continuing to on or about June 2019, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, PRAGNESHKUMAR “PETE” PATEL, and OMRAM, LLC**, in and affecting interstate and foreign commerce, knowingly benefitted and attempted to benefit financially and receive anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, maintained, and patronized any person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause the person to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(2), (b)(1), and 2.

Count 6

Beginning on a date unknown, but not later than on or about September 2017, and continuing to on or about June 18, 2019, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, PRAGNESHKUMAR “PETE” PATEL, and OMRAM, LLC**, knowingly used, and caused to be used, one or more facilities in interstate and foreign commerce, namely the Best Choice Inn located at 7640 Central Avenue Southeast, Albuquerque, New Mexico 87108, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of an unlawful activity,

that is, a business enterprise involving narcotics and controlled substances in violation of 21 U.S.C. §§ 846, 856(a), and 860(a) and prostitution offenses in violation of the laws of the state of New Mexico, N.M. Stat. Ann. §§ 30-9-2, 30-9-3, 30-9-4, and 30-9-4.1, and thereafter performed and caused to be performed, and attempted to perform an act to promote, manage, establish, carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activities.

In violation of 18 U.S.C. §§ 1952(a)(3)(A) and 2.

Count 7

Beginning on a date unknown, but not later than on or about September 2017, and continuing to on or about June 18, 2019, in Bernalillo County, in the District of New Mexico, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, and PRAGNESHKUMAR “PETE” PATEL**, unlawfully, knowingly, and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense defined in 21 U.S.C. § 856, specifically, maintaining a drug-involved premises.

In violation of 21 U.S.C. § 846.

Count 8

Beginning on a date unknown, but not later than on or about September 2017, and continuing to on or about June 18, 2019, in Bernalillo County, in the District of New Mexico, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, PRAGNESHKUMAR “PETE” PATEL, and OMRAM, LLC**, knowingly and

intentionally opened, leased, rented, used, and maintained a place, that is, the premises at 7640 Central Avenue Southeast, Albuquerque, New Mexico, and managed and controlled, as an owner, lessee, agent, employee, occupant, and mortgagee, said premises, renting, leasing, profiting from, and making it available for the purpose of unlawfully storing, distributing, and using controlled substances, namely: methamphetamine and heroin.

In violation of 21 U.S.C. § 856(a) and 18 U.S.C. § 2.

Count 9

Beginning on a date unknown, but not later than on or about September 2017, and continuing to on or about June 18, 2019, in Bernalillo County, in the District of New Mexico, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, PRAGNESHKUMAR “PETE” PATEL, and OMRAM, LLC**, knowingly and intentionally opened, leased, rented, used, and maintained a place, that is, the premises at 7640 Central Avenue Southeast, Albuquerque, New Mexico, and managed and controlled, as an owner, lessee, agent, employee, occupant, and mortgagee, said premises, renting, leasing, profiting from, and making it available for the purpose of unlawfully storing, distributing, and using controlled substances, namely: methamphetamine and heroin, in violation of 21 U.S.C. § 856(a)(1) and (2), within 1,000 feet of the real property comprising PB&J Special Education center, a public elementary school, and within 1,000 feet of the real property compromising the All Seasons Day School, a private elementary school.

In violation of 21 U.S.C. § 860(a).

Count 10

Beginning on a date unknown, but not later than on or about September 2017, and continuing to on or about June 18, 2019, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, and PRAGNESHKUMAR “PETE” PATEL**, did knowingly combine, conspire, agree, and act interdependently with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of 18 U.S.C. § 1956, specifically, to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is:

Sex Trafficking by Means of Force, Threats, Fraud, and Coercion, in violation of 18 U.S.C. §§ 1591(a)(1), (b)(1), and 2; Benefitting Financially from a Sex Trafficking Venture, in violation of 18 U.S.C. §§ 1591(a)(2), (b)(1) and 2; Interstate and Foreign Travel and Transportation in Aid of Racketeering Enterprises, in violation of 18 U.S.C. §§ 1952(a)(3) and 2; and Maintaining a Drug-Involved Premises, in violation of 21 U.S.C. § 856(a) and 18 U.S.C. § 2; and Maintaining a Drug-Involved Premises Within 1,000 Feet of a School, in violation of 21 U.S.C. § 860 and 18 U.S.C. § 2; knowing that the transactions were designed in whole and in part to conceal and disguise the source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

Manner and Means

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. It was part of the conspiracy and scheme that the defendants and their co-conspirators would deposit proceeds of specified unlawful activities (alleged in Counts 1-8) into corporate accounts at financial institutions after commingling the cash proceeds of specified unlawful activities with legitimate cash income generated by the Best Choice Inn.

2. It was further part of the conspiracy and scheme that proceeds of specified unlawful activities would be transferred between bank accounts owned or controlled by the conspirators as “lease payments” for the Best Choice Inn from **KAMAL BHULA** to **PRAGNESHKUMAR “PETE” PATEL**.

3. It was an aim of the conspiracy to conceal or disguise the nature, the location, the source, the true ownership, or the control of the proceeds generated by the specified unlawful activities.

Overt Acts

4. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico and elsewhere:

5. As part of the conspiracy, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON**, and **PRAGNESHKUMAR “PETE” PATEL**, received cash proceeds of the specified unlawful activities alleged in counts 1-9.

6. As part of the conspiracy, **PRAGNESHKUMAR “PETE” PATEL**, or others acting under his direction, made the following cash deposits of proceeds of the specified

unlawful activities alleged in Counts 1-9 into an account purporting to be a business account, but controlled by **PRAGNESHKUMAR “PETE” PATEL**:

<u>Date</u>	<u>Amount</u>
09/27/17	\$4,959
10/02/17	\$14,445.86
10/31/17	\$10,862.90
11/09/17	\$7,389.68
01/02/18	\$11,192
01/19/18	\$8,612.25

7. As part of the conspiracy, **KAMAL BHULA**, or others acting under his direction, made the following cash deposits of proceeds of the specified unlawful activities alleged in Counts 1-9 into an account purporting to be a business account, but controlled by **KAMAL BHULA**:

<u>Date</u>	<u>Amount</u>
03/21/18	\$10,262.40
04/03/18	\$12,117.56
04/09/18	\$10,046.25
06/04/18	\$12,000
07/10/18	\$11,000
08/27/18	\$8,300
09/04/18	\$9,901

8. Once cash proceeds of specified unlawful activities were deposited, these funds would then be used to fund the operations and expenses of the hotel, salary for hotel workers, payments for co-conspirators, and personal expenses for the conspirators out of the accounts which received the deposits, further giving the cash proceeds the appearance of legitimate hotel income.

9. Recurring payments were also made from **KAMAL BHULA**, using a bank

account in the name with Omram, LLC, to **PRAGNESHKUMAR “PETE” PATEL**, using a bank account in the name of Saishivam Lodging, LLC, purportedly for the use of the real property known as the Best Choice Inn. A selection of these payments were made as follows:

<u>Date</u>	<u>Amount</u>	<u>Description</u>
05/29/18	\$21,037.58	Transfer of funds from Omram, LLC Bank Account *9132 to Saishivam Lodging, LLC DBA Best Choice Inn Bank Account *4535
06/26/18	\$21,037.58	Transfer of funds from Omram, LLC Bank Account *9132 to Saishivam Lodging, LLC DBA Best Choice Inn Bank Account *4535
07/27/18	\$21,037.58	Transfer of funds from Omram, LLC Bank Account *9132 to Saishivam Lodging, LLC DBA Best Choice Inn Bank Account *4535

In violation of 18 U.S.C. § 1956(h).

FORFEITURE ALLEGATION 1

The allegations contained in Counts 1 through 5 of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 1594(d) and (e).

Upon conviction of any offense in violation of 18 U.S.C. §§ 1591, and 1594, the defendants, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, PRAGNESHKUMAR “PETE” PATEL, and OMRAM, LLC**, shall forfeit to the United States, pursuant to 18 U.S.C. §§ 1594(d) and (e), any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of the offense, and any property traceable to such property; and any property, real or personal constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense, or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

1. PERSONAL JUDGMENT

A sum of money representing the property constituting, or derived from, any proceeds that the defendant(s) obtained, directly or indirectly, as a result of the offenses set forth in Counts 1 through 5.

2. REAL PROPERTY

7640 Central Avenue Southeast, Albuquerque, New Mexico 87108

More particularly described as: LT 1-A BLK 1 PLAT OF LT 1-A BLK 1 B M MOORE ADDITION COUNT 0, Bernalillo County, New Mexico, as the same is shown and designated on the plat thereof, filed in the office of the County Clerk of said Bernalillo County, New Mexico. Assessor's parcel number 101905720306930415.

3. BANK ACCOUNTS

- a. Bank of America, Account # *****4535
“Saishivam Lodging, LLC DBA Best Choice Inn,”
- b. Bank of America, Account # *****9132
“OMRAM, LLC,”

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 18 U.S.C. § 1594(e), which incorporates the provisions of 18 U.S.C. §§ 981 through 985 and 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

FORFEITURE ALLEGATION 2

Count 6 of this Indictment is hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461.

Upon conviction of any offense in violation of 18 U.S.C. § 1952, the defendants,

**KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON,
PRAGNESHKUMAR “PETE” PATEL, and OMRAM, LLC,** shall forfeit to the United

States pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461, all property which constitutes or is derived from proceeds traceable to the commission of the offense.

The property to be forfeited to the United States includes but is not limited to the following:

1. PERSONAL JUDGMENT

A sum of money representing the property constituting, or derived from, any proceeds that the defendant(s) obtained, directly or indirectly, as a result of the offenses set forth in Count 6.

2. REAL PROPERTY

7640 Central Avenue Southeast, Albuquerque, New Mexico 87108

More particularly described as: LT 1-A BLK 1 PLAT OF LT 1-A BLK 1 B M MOORE ADDITION COUNT 0, Bernalillo County, New Mexico, as the same is shown and designated on the plat thereof, filed in the office of the County Clerk of said Bernalillo County, New Mexico. Assessor's parcel number 101905720306930415.

3. BANK ACCOUNTS

- a. Bank of America, Account # *****4535
“Saishivam Lodging, LLC DBA Best Choice Inn,”
- b. Bank of America, Account # *****9132
“OMRAM, LLC,”

If any of the property described above, as a result of any act or omission of the defendants:

- f. cannot be located upon the exercise of due diligence;
- g. has been transferred or sold to, or deposited with, a third party;
- h. has been placed beyond the jurisdiction of the court;

- i. has been substantially diminished in value; or
- j. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

FORFEITURE ALLEGATION 3

The allegations contained in Counts 7-9 of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

Upon conviction of an offense in violation of 21 U.S.C. § 846 or 21 U.S.C. § 856, pursuant to 21 U.S.C. § 853, the defendants **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, PRAGNESHKUMAR “PETE” PATEL, and OMRAM, LLC**, shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s). The property to be forfeited includes, but is not limited to, the following:

1. PERSONAL JUDGMENT

A sum of money representing the property constituting, or derived from, any proceeds that the defendant(s) obtained, directly or indirectly, as a result of the offenses set forth in Counts 7-9.

2. REAL PROPERTY

7640 Central Avenue Southeast, Albuquerque, New Mexico 87108

More particularly described as: LT 1-A BLK 1 PLAT OF LT 1-A BLK 1 B M MOORE ADDITION COUNT 0, Bernalillo County, New Mexico, as the same is shown and designated on the plat thereof, filed in the office of the County Clerk of said Bernalillo County, New Mexico. Assessor's parcel number 101905720306930415.

3. BANK ACCOUNTS

- a. Bank of America, Account # *****4535
“Saishivam Lodging, LLC DBA Best Choice Inn,”
- b. Bank of America, Account # *****9132
“OMRAM, LLC,”

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

FORFEITURE ALLEGATION 4

The allegations contained in Count 10 of this indictment is hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(1).

Upon conviction of an offense in violation of 18 U.S.C. § 1956, **KAMAL BHULA, JOHNATHAN CRAFT, EDDIE HILL, WILLIE HORTON, PRAGNESHKUMAR “PETE” PATEL**, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or all property traceable thereto. The property to be forfeited includes, but is not limited to, the following:

1. PERSONAL JUDGMENT

A sum of money representing the property constituting, or derived from, any proceeds that the defendant(s) obtained, directly or indirectly, as a result of the offense set forth in Count 10.

2. REAL PROPERTY

7640 Central Avenue Southeast, Albuquerque, New Mexico 87108

More particularly described as: LT 1-A BLK 1 PLAT OF LT 1-A BLK 1 B M MOORE ADDITION COUNT 0, Bernalillo County, New Mexico, as the same is shown and designated on the plat thereof, filed in the office of the County Clerk of said Bernalillo County, New Mexico. Assessor's parcel number 101905720306930415.

3. BANK ACCOUNTS

- a. Bank of America, Account # *****4535
“Saishivam Lodging, LLC DBA Best Choice Inn,”
- b. Bank of America, Account # *****9132
“OMRAM, LLC,”

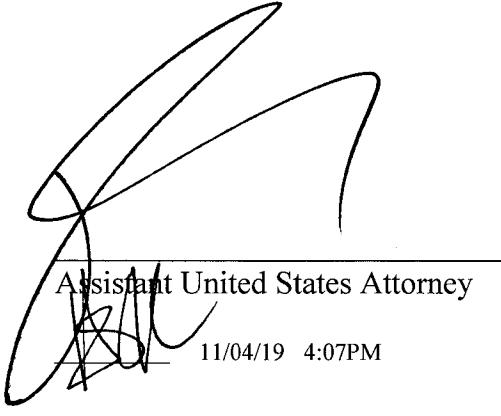
If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

It is the intent of the United States, pursuant to 21 U.S.C. § 853(p), and as incorporated by 18 U.S.C. § 982(b) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL:


/s/
FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

11/04/19 4:07PM